Case 22-13116-mdc Doc 38 Filed 05/18/23 Entered 05/18/23 16:34:01 Desc Main

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United States Bankruptcy Court Eastern District of Pennsylvania

| In re: | Case No. 22-13116-amc |
|-----------------------|------------------------|
| William Terral Smith, | Chapter 13 |
| Debtor. | Response to ECF No. 33 |

Debtor's Response to Motion for Relief from Stay

AND NOW, Debtor William Terral Smith, by and through their attorney, hereby responds to the Motion for Relief from Stay filed by Government Loan Securitization Trust 2011-FV1.

The Debtor opposes the motion. The arrearage alleged in the motion is insignificant and can be cured in short order. The Debtor has already made a substantial curative payment, and intends to make more. Accordingly, no grounds for relief exist.

NOW, THEREFORE, the Debtor asks this Court to deny the motion in the form of order attached.

Date: May 18, 2023 CIBIK LAW, P.C. Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
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Philadelphia, PA 19102
215-735-1060
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Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Response to Motion for Relief from Stay to be served on Government Loan Securitization Trust 2011-FV1 through the CM/ECF system along with all attachments.

Date: May 18, 2023

/s/ Michael A. Cibik

Michael A. Cibik

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

| In re: | Case No. 22-13116-mdc | |
|-------------------------------------------------------------------------------------|-----------------------------------------------------|--|
| William Terral Smith, | Chapter 13 | |
| Debtor. | Related to ECF No. 33 | |
| ORDER | | |
| AND NOW, after consideration of the Motion for Relief from Stay filed by Government | | |
| Loan Securitization Trust 2011-FV1, and after no | otice and hearing, it is hereby ORDERED that | |
| the motion is DENIED . | | |
| | | |
| | | |
| Date: | | |
| | Magdeline D. Coleman Chief U.S. Bankruptcy Judge | |